

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AKAMAI TECHNOLOGIES, INC. and
AKAMAI SECURITIES CORPORATION,

Plaintiffs,

v.

DEUTSCHE BANK AG,

Defendant.

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) Civil Action No:
) 10-CV-10254-JLT
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PLAINTIFFS' MOTION FOR SPECIFIC DISCOVERY
TO PRESERVE EVIDENCE AND PREVENT UNDUE PREJUDICE

Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation (collectively, "Akamai") hereby respectfully move this Court to lift the automatic stay imposed by the Private Securities Litigation Reform Act ("PSLRA"), 15 U.S.C. § 78u-4(b)(3)(B), to allow Akamai to seek particularized discovery from Deutsche Bank AG and Deutsche Bank Securities Inc. and to issue document preservation subpoenas to third parties. In support of its motion, Akamai submits contemporaneously herewith its Memorandum of Law in Support of its Motion for Specific Discovery to Preserve Evidence and Prevent Undue Prejudice, and the Affidavit of Michael T. Gass, dated September 27, 2010, with attached exhibits.

WHEREFORE, Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation respectfully request that this Court enter an order (i) allowing the specific discovery requested to preserve evidence and prevent undue prejudice, and (ii) granting such further relief as this Court deems appropriate.

Dated: September 27, 2010

Respectfully submitted,

AKAMAI TECHNOLOGIES, INC. and AKAMAI
SECURITIES CORPORATION

By its attorneys,

/s/ Michael T. Gass

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REQUEST FOR ORAL ARGUMENT

Akamai believes that an oral argument may assist the Court in deciding the issues raised in this motion, and, as a result, pursuant to Local Rule 7.1(d), Akamai respectfully requests a hearing on this motion.

CERTIFICATE UNDER LOCAL RULE 7.1(A)(2)

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel for Akamai Technologies, Inc. and Akamai Securities Corporation hereby certifies that counsel for the Plaintiffs has conferred with counsel for the Defendant concerning the subject matter of this Motion. Defendant does not consent to this Motion.

/s/ Michael T. Gass
Michael T. Gass

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 27, 2010.

/s/ Michael T. Gass
Michael T. Gass